

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA

ANDRE DUKEAL FLAGG / 310705  
Full name and prison number  
of plaintiff(s)

v.

MOORE, K - 38134  
WATSON, J.M. - 38179  
MARSHAL - CORRECTIONAL OFFICER  
MURPHY - C/O  
WOMACK - C/O  
TRAMER - C/O  
RASH - C/O  
GRANTON - C/O

Name of person(s) who violated  
your constitutional rights.  
(List the names of all the  
persons.)

1:17-cv-859-WHA-CSC

CIVIL ACTION NO. 1:17 cv 642-WKN  
(To be supplied by Clerk of  
U.S. District Court)

RECEIVED  
2017 DEC 20 P 12:31  
DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES ( ☒ ) NO ( ☐ )
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES ( ☐ ) NO ( ☒ )
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) ANDRE DUKEAL FLAGG

Defendant(s) J. TRAWICK; R. CAINE; MARSHAL;  
WATERS, WEST, DR. JASON SMARK

2. Court (if federal court, name the district; if state court, name the county) THE MIDDLE

THE UNITED STATE DISTRICT COURT FOR THE MIDDLE  
DISTRICT OF ALABAMA

3. Docket number (N/A)
4. Name of judge to whom case was assigned (N/A)
5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) STILL PENDING
6. Approximate date of filing lawsuit 12.10.2017
7. Approximate date of disposition (N/A)

II. PLACE OF PRESENT CONFINEMENT KELBY CORRECTIONAL FACILITY  
P.O. BOX 150 MT. MEIGS, AL 36057

PLACE OF INSTITUTION WHERE INCIDENT OCCURRED HOUSTON COUNTY  
JAILHOUSE 901 EAST MAIN STREET DODD, AL 36301

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

NAME

ADDRESS

1. K. MOORE
2. J.M. WATSON
3. MURPHY
4. MARSHAL
5. THORMAN
6. WOMACK

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED 08.08.17

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: 4TH, 8TH, AND 14TH

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

ON 08.05.2017 AT HOUSTON COUNTY JAIL HOUSE, THE PLAINTIFF  
PRO'SE WAS UNLAWFULLY TASERED BY OFFICER SGT. WATSON  
BEHIND THE BACK FOR NOT HAND CUFFING SO THEY COULD PHYSICALLY  
TAKE MY LEGAL LAW WORK FROM MY PERSON. THE PLA. WAS TASERED, TASE,  
DRIVE APPROXIMATELY 12 TIMES; SEE VIDEO FOOTAGE FROM WATSON, MAXWELL  
AND MOORE'S TASERS  
GROUND TWO:

ASSAULT BY CORRECTIONAL OFFICER,  
EIGHTH AMENDMENT, CRUEL AND UNUSUAL PUNISHMENT

SUPPORTING FACTS: THE PLAINTIFF WAS PHYSICALLY BEATEN  
WITH AND WITHOUT HAND CUFFS AND STRIP OF ALL WAISTES;  
AND MAT / BLANKET. CHECK ALL ABOVE NAMED DEF'S.  
TASER CAMERA VIDEOS

GROUND THREE: EIGHTH AMENDMENT, CRUEL AND UNUSUAL  
PUNISHMENT

SUPPORTING FACTS: THE PLAINTIFF WAS FORCED TO USE  
BATHROOM WITH HAND CUFFS AND SHACKLES ON APPROXIMATELY  
AFTER THIS ABOVE NAMED DATE. AND OFFICER AIMED  
TASERS AT PLAINTIFF EVERY TIME DOOR WAS OPENED AND  
PLA. WAS SECURED IN RESTAURANT PRIOR TO TASERS BEING  
DRAWN AT HIM. CHECK ALL ABOVE NAMED DEF'S TASER  
CAMERA VIDEOS

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.  
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

THE PLAINTIFF SPECIFY'S INTENT IS TO SUE DEFENDANT'S  
INDIVIDUALS AND OFFICIAL CAPACITY, ALSO FOR PARTY'S  
INVOLVED TO BE TERMINATED FROM CORRECTIONAL FACILITIES

Andie D. Foy  
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true  
and correct.

EXECUTED on 12.19.2017  
(Date)

Andie D. Foy  
Signature of plaintiff(s)

ANDREA D. FLAGG / 310705

ADDL KELBY

KELBY CORRECTIONAL FACILITY

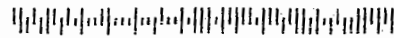
P.O. BOX 150

MT, MEIGS, AL 36057

LEG.



LEGAL MAIL



OFFICE OF THE CLERK  
UNITED STATES DISTRICT COURT  
ONE CHURCH STREET, SUITE B-110  
MONTGOMERY, AL 36104-4018

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